

RM 10.9 Removal Action Path Forward

Final Design Report

- February 11 - submit to EPA tables showing sediment characteristics of Removal Area sediment and explanation of how pore water sample results will be used to set a final cap design
- February 25 - submit to EPA draft Final Design Report
 - Will incorporate responses to most comments and design updates especially on the dredging, marine transportation, stabilization, wastewater treatment, landfill disposal and a draft of the Community Health and Safety Plan
 - Will not address water quality and long term monitoring plans. These will be addressed in subsequent submittals:
 - Appendix E (see schedule for Construction Environmental Monitoring below)
 - Appendix I (see schedule for Field and Lab Work to Refine Cap Design below)
 - Appendix J (see schedule for Construction Quality Control Plan below)
 - Appendix K (see schedule for Cap Interim-Term Monitoring and Long-Term Maintenance Plan below)
- March 28 - Receive comments from EPA on the draft Final Design Report
- April 22 - Submit Final Design Report to EPA for approval

Field and lab work to refine cap design (Appendix I)

- February 1 - submit RTC for final review
- February 4 - 15- field work
- Week of February 18 - extraction of pore water via centrifugation
- Week of March 11 - recommendation on whether (and how) to obtain seepage velocity measurements (QAPP-F)
- Week of March 25 - recommendation on whether (and how) to perform Hg- breakthrough tests (QAPP-G)
- Week of April 1 - propose final design of cap's active layer (assuming seepage velocity and Hg breakthrough tests are not needed)

Construction Environmental (Water Quality) Monitoring (Appendix E)

- February 15 – propose a teleconference with EPA to discuss previously-received comments on water quality monitoring plan
- March 4 - submit to EPA a draft water quality monitoring plan (Appendix E of Final Design Report)
- (And submit to NJDEP for WFD permit-equivalent)
- Week of May 6 - begin deployment of water quality monitoring stations
- Week of May 13 - begin baseline monitoring

Construction Quality Control Plan (Appendix J)

- Week of February 25 – contracting recommendations to the TC
- March 5 – TC approval of recommendations
- March 12 – CPG approval of sub-contracting recommendations
- March 13 – notice to EPA of subcontracting recommendations (dredging, stabilization, treatment, transportation, landfill and capping)

Draft – Subject To Review and Revision

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- Week of March 18 – Support selected vendor as they submit their AUD application
 - Week of May 13 – Anticipated date for issuance of AUD to selected facility
 - Week of May 13 – submit contractor's Construction Quality Control Plan to EPA

Cap Long Term Monitoring and Maintenance Plan (Appendix K)

- Week of March 4- Provide outline to EPA of a Cap Long Term Monitoring & Maintenance Plan
- Week of March 25 - Gain agreement with EPA as to the appropriate scope for each plan
- Week of April 8 - Submit draft plans to EPA for review
- Week of April 29 - Review comments from EPA and revise plans

ARAR Issues

- DONE February 6 - teleconference with NJDEP to discuss approaches for all permit equivalent applications
- Week of February 18 - submit Tidelands and Waterfront permit application packages
- Week of February 25 - confirm with NJDEP all application packages are complete other than specific identified gaps (e.g., 30 d period for property owner input, WQ monitoring, AUD applications by vendors)
- March 4 – submit draft water quality monitoring plan concurrent with submittal to EPA as it is a part of the information needed to provide a Waterfront Development and Dredging License
- Week of Mar 18 check-in w/ NJDEP on review status
- Week of Apr 8 - receive dredging license and submit to Bureau of Tidelands
- Apr 16 deadline to submit WFD permit-equivalent to Tidelands Commission to get on Tidelands calendar
- Week of Apr 22 (or sooner – must be 60 days prior to removal, with some contingency), EPA to issue CERCLA Notice of Availability in major newspaper. (public has 30 days to respond, then EPA needs to issue a RTC)
- May 1 - Bureau of Tidelands provides final approval for dredging

AUD Issues Relate to Stabilization

- Identification of Vendors Responsibilities - CPG will continue to work with them and track their progress; anticipated dates of their activities follow:
 - Week of February 11 - vendors submit their PTE data to DEP, with evaluation of whether permit modification is needed
 - For Clean Earth: RM 10.9 sediment can be handled within existing permit
 - For Cashman: RM 10.9 sediment should be able to be handle within existing permit.
 - Week of February 18 - provide sediment samples to Cashman and Clean Earth for stabilization testing Month of March - submit proof of stabilization process to DEP (% Portland and TCLP results) and elutriate samples results
 - Month of March - let contract with the successful vendor and provide additional support as needed to ensure AUD and Air Permits are in place by mid-year
 - End of March - confer with DEP about status of both vendors AUD permit applications